



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

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970427  
EC-2

December 23, 1997

Reply To  
Attn Of: ECO-088

Ref:96-093-AFS

Bruce Sims  
Tongass National Forest  
P.O. Box 309  
Petersburg, Alaska 99833

Dear Mr. Sims:

The Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (draft EIS) for the proposed **Crystal Creek Timber Harvest** in accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act. The draft EIS analyzes a no action alternative and four action alternatives to harvest between approximately 14 and 18 million board feet of timber from a project area located roughly seven to twelve miles northeast of Petersburg, Alaska. The draft EIS does not identify a preferred action alternative.

We are pleased to see that many of the topics/issues identified in our scoping comments have been addressed in the design of the proposed action alternatives. We believe that the use of buffers prescribed in the Riparian Standards and Guidelines of the 1997 Tongass Land Management Plan (TLMP), the use of temporary bridges, the obliteration of all temporary roads, the avoidance of wetlands and steep slopes, and the use of non-clearcutting harvest techniques will provide for significant protection of resources within the project area. While we are relatively comfortable with many of the elements of the action alternatives presently being considered, we have the following concerns that should be addressed in the final EIS.

**Thomas Bay Log Transfer Facility (LTF)**

We are concerned with the lack of specificity in how the existing Thomas Bay LTF would be reconstructed and operated with the implementation of any of the proposed action alternatives. While the information presented in Appendix C provides useful information related to options available for modifying the LTF, we were unable to determine what design would ultimately be employed, along with the environmental impacts associated with the operation of the LTF. We recommend that the final EIS provide additional information related to design and operation of the Thomas Bay LTF, how the LTF would conform with the Alaska Timber Task Force's *Log Transfer Facility Siting, Construction, Operation and Monitoring/Reporting Guidelines*, and a disclosure of the potential environmental impacts from LTF operation. We also recommend inclusion of the 1997 dive survey report as an appendix to the final EIS.

In general, the EPA supports alternatives to log transfer which would minimize or avoid



the direct, indirect, and cumulative impacts to the marine environment. The direct transfer of logs from land to a barge would avoid and minimize the adverse impacts of bark discharge, accumulation, shading, and compaction associated with log transfer, rafting, and storage.

### **Mitigation Measures**

We recommend that the final EIS include greater discussion of the mitigation measures that would be employed with the selected alternative. While we appreciate the intent of the Forest Service to minimize the length of the document, we find it difficult to determine the mitigation measures to be used by relying solely on the unit and road cards presented in Appendix B. We believe that a summary table of mitigation measures (including identification of and/or reference to applicable Forest Service (and other relevant) direction should be included in Section 2 of the final EIS to provide the decision maker and the public a clearer understanding of the measures to be taken to mitigate impacts associated with project implementation.

### **Purpose and Need**

We believe there are issues related to National Environmental Protection Act (NEPA) implementation that arise by explicitly specifying a harvest volume in the purpose and need section of the draft EIS. For example, in stating that the needed volume from the proposed project is approximately 16 million board feet (MMBF), it appears that the range of alternatives has been unnecessarily limited to those that would meet the specified volume. Furthermore, in defining a specific volume for this project, we have concerns that critical decisions in the planning process (i.e., determination of the target volume) may have been made without adequate public involvement.

Additionally, we have concerns that the specification of a target harvest volume in the purpose and need section of the draft EIS may conflict with the Forest Service's stated direction of using "ecosystem management" in their decision-making process. We are concerned that in defining a target volume in the purpose and need statement of the EIS, it appears that the Forest Service may be managing the ecosystem "around" the desired timber harvest level instead of identifying the elements needed to maintain a healthy ecosystem and evaluating the project alternatives in relation to those needs. We believe that a management approach which is driven by pre-defined harvest levels will not ensure maintenance of a truly healthy ecosystem within (and outside) the project area.

While Appendix A presents a useful discussion of timber demand on the Tongass and how the Stikine Area is expected to contribute to meeting that demand, we are still unable to determine the basis for the 16 MMBF target volume that is presented as part of the purpose and need. Appendix A appears to be justifying the harvest volume by stating that the "proposed harvest of 16 MMBF from the Crystal Creek Project Area is reasonable and valid" because it will contribute to the average annual volume of 77 MMBF assigned to the Stikine Area on lands using standard logging technology. Unfortunately, Appendix A does not present how the 16 MMBF was derived for the proposed project area.

We recommend that the final EIS either 1) eliminate the target volume of 16 MMBF from the purpose and need or 2) clearly discuss the process/methodologies used in determining the

target harvest volume identified as a project purpose.

Based on these concerns, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system used in our review is enclosed for your reference.

We are interested in working closely with the Forest Service in the resolution of these issues and I encourage you to contact Bill Ryan at (206) 553-8561 at your earliest convenience to discuss our comments and how they might best be addressed.

Thank you for the opportunity to review this draft EIS.

Sincerely,

A handwritten signature in cursive script that reads "Richard B. Parkin". The signature is written in dark ink and is positioned below the word "Sincerely,".

Richard B. Parkin, Manager  
Geographic Implementation Unit

Enclosure

cc: Kevin Hanley, ADEC  
Ralph Thompson, ACOE-Juneau